

# EXHIBIT C

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1                   IN THE UNITED STATES DISTRICT COURT

2                   DISTRICT OF MINNESOTA

3 \_\_\_\_\_

4 Pro-Life Action  
Ministries, Lucy Maloney,  
5 Thomas Wilkin, and Debora  
Braun,  
6  
7 Plaintiffs, Case No. 23-CV-853 (ECT/DJF)  
8  
9 v.  
10 City of Minneapolis, a  
Minnesota municipality,  
Defendant.

13 \*\*\*\*\* UNCERTIFIED ROUGH DRAFT TRANSCRIPT \*\*\*\*\*

15 DEPOSITION OF  
16 THOMAS WILKIN  
17 Friday, June 21, 2024

23

24 JOB NO.: MW 6752039

25 REPORTED BY: Merilee Johnson, RDR, CRR, CRC, RSA



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1 \*\*\*\*\* BEGINNING OF UNCERTIFIED ROUGH DRAFT \*\*\*\*\*

2 THOMAS WILKIN,

3 duly affirmed, was examined and testified as follows:

4 EXAMINATION

5 BY MS. HUMAYUN:

6 Q. Good morning, Mr. Wilkin.

7 A. Good morning.

8 Q. I am Munazza Humayun. We've met before and  
9 I'm here with my co-counsel, Sara Lathrop. And  
10 we're here for a deposition today, as you  
11 understand, in PLAM versus City of Minneapolis.

12 I'm going to go over some ground rules and  
13 ask you a series of questions.

14 Have you ever been deposed before?

15 A. I have not.

16 Q. Okay. I'm sure the process has been

9           A.    Okay. I mean, our entire training could  
10   be -- could be described in terms of dos and don'ts,  
11   either required or at least -- or at least  
12   recommended.

13           Q.    How long is the training seminar?

14           A.    The training seminar is typically two  
15   hours.

16           Q.    What are some don'ts?

17           A.    Don't respond with angry words even if you  
18   are provoked. Don't touch anyone who is not with  
19   our ministry unless they clearly indicate that they  
20   want a hug or in some other way are open to that.

21                   Do not block access to the abortion  
22   facility; in other words, don't violate the FACE  
23   Act. Do not be angry or judgmental with your tone  
24   or words, as I mentioned.

25           Q.    Once a sidewalk counselor or would-be

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1   sidewalk counselor completes the two-hour training  
2   seminar and completes a shadowing shift with an  
3   experienced counselor, are they required to undergo  
4   the same seminar again periodically?

5           A.    They are not required to.